

## **Exhibit 28**

Company	Date	Penalty Amount	Description	Agency
Wells Fargo & Company	3/30/2023	\$ 67,762,500.00	The Federal Reserve Board fined Wells Fargo & Co. for the firm's unsafe or unsound practices relating to historical inadequate oversight of sanctions compliance risks at its subsidiary bank, Wells Fargo Bank, N.A. Wells Fargo & Co.'s deficient oversight enabled the bank to violate U.S. sanctions regulations by providing a trade finance platform to a foreign bank that used the platform to process approximately \$532 million in prohibited transactions between 2010 and 2015.	Federal Reserve
Wells Fargo Bank, N.A.	3/30/2023	\$ 30,000,000.00	The Office of Foreign Asset Control announced that Wells Fargo Bank agreed to settle potential civil liability for 124 apparent violations from 2008 until 2015. Wells Fargo, and its predecessor, Wachovia Bank, provided a foreign bank with software used to process trade finance transactions with U.S.-sanctioned jurisdictions and persons.	Office of Foreign Assets Control
Wells Fargo Bank	12/20/2022	\$ 3,700,000,000.00	The Consumer Financial Protection Bureau ordered Wells Fargo Bank to pay more than \$2 billion in redress to consumers and a \$1.7 billion civil penalty for legal violations across several of its largest product lines. The CFPB stated the the bank's illegal conduct led to billions of dollars in financial harm to its customers. Consumers were said to have been illegally assessed fees and interest charges on auto and mortgage loans, had their cars wrongly repossessed, and had payments to auto and mortgage loans misapplied by the bank.	Consumer Financial Protection Bureau
Wells Fargo	9/1/2022	\$ 22,000,000.00	OSHA found that Wells Fargo violated the whistleblower protection provisions of the Sarbanes-Oxley Act for improperly terminating a Chicago area-based senior manager in the company's commercial banking segment. The senior manager had repeatedly voiced concerns to area managers and the corporate ethics line regarding conduct they believed violated relevant financial laws, including wire fraud. The manager expressed concerns that they were directed to falsify customer information and alleged that management was engaged in price fixing and interest rate collusion through exclusive dealing.	Occupational Safety & Health Administration
Wells Fargo Advisors	5/20/2022	\$ 7,000,000.00	The Securities and Exchange Commission announced charges against Wells Fargo Advisors for failing to file at least 34 Suspicious Activity Reports (SARs) in a timely manner between April 2017 and October 2021. Wells Fargo Advisors agreed to pay \$7 million to settle the charges.	Securities and Exchange Commission

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Wells Fargo Bank, N.A.	9/27/2021	\$ 72,600,000.00	Federal prosecutors settled a civil fraud lawsuit against Wells Fargo Bank, N.A. alleging that it violated the Financial Institutions Reform Recovery and Enforcement Act by fraudulently overcharging customers, including small businesses and federally-insured financial institutions, which used the bank's foreign exchange service. The United States alleged that, from 2010 through 2017, Wells Fargo FX sales specialists defrauded customers by systematically charging higher markups on FX transactions than they represented the bank would charge, and concealing these overcharges through various misrepresentations and deceptive practices.	U.S. Attorney-Southern District of New York
Wells Fargo Bank, National Association	9/9/2021	\$ 250,000,000.00	Unsafe or unsound practices related to material deficiencies regarding the bank's loss mitigation activities, including loan modification decisions and operational practices, and inadequate Independent Risk Management and Internal Audit of the bank's loss mitigation activities.	Office of the Comptroller of the Currency
Wells Fargo & Company	2/21/2020	\$ 3,000,000,000.00	Wells Fargo & Company and its subsidiary, Wells Fargo Bank, N.A., entered into a deferred prosecution agreement and agreed to pay \$3 billion to resolve their potential criminal and civil liability stemming from a practice between 2002 and 2016 of pressuring employees to meet unrealistic sales goals that led thousands of employees to provide millions of accounts or products to customers under false pretenses or without consent, often by creating false records or misusing customers' identities. The settlement also resolved an investigation being conducted by the SEC, which was to receive \$500 million of the total to distribute to investors.	Justice Department Civil Division
Wells Fargo Bank N.A.	12/28/2018	\$ 575,000,000.00	Wells Fargo Bank N.A. paid \$575 million to settle multistate litigation alleging that it violated consumer protection laws by (1) opening millions of unauthorized accounts and enrolling customers into online banking services without their knowledge or consent, (2) improperly referring customers for enrollment in third-party renters and life insurance policies, (3) improperly charging auto loan customers for force-placed and unnecessary collateral protection insurance, (4) failing to ensure that customers received refunds of unearned premiums on certain optional auto finance products, and (5) incorrectly charging customers for mortgage rate lock extension fees.	Multistate Attorneys General Case

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Wells Fargo & Company	10/22/2018	\$ 65,000,000.00	The New York Attorney announced that Wells Fargo & Company agreed to pay a \$65 million penalty to resolve allegations that the bank made fraudulent statements to investors in connection with its cross-sell business model, related sales practices, and the bank's publicly reported cross-sell metrics.	New York Attorney General
Wells Fargo Bank, N.A.	8/1/2018	\$ 2,090,000,000.00	Wells Fargo Bank, N.A. and several of its affiliates agreed to pay a civil penalty of \$2.09 billion under the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA) based on the bank's alleged origination and sale of residential mortgage loans that it knew contained misstated income information and did not meet the quality that Wells Fargo represented.	Justice Department Civil Division
Wells Fargo Bank N.A.	4/20/2018	\$ 500,000,000.00	The Office of the Comptroller of the Currency assessed a \$500 million civil money penalty against Wells Fargo Bank, N.A., and ordered the bank to make restitution to customers harmed by its unsafe or unsound practices, and develop and implement an effective enterprise-wide compliance risk management program.	Office of the Comptroller of the Currency
Wells Fargo Bank N.A.	4/20/2018	\$ 500,000,000.00	The Consumer Financial Protection announced a settlement with Wells Fargo Bank, N.A. in a coordinated action with the Office of the Comptroller of the Currency (OCC). The Bureau found that Wells Fargo violated the Consumer Financial Protection Act in the way it administered a mandatory insurance program related to its auto loans. The Bureau also found that Wells Fargo violated the CFPA in how it charged certain borrowers for mortgage interest rate-lock extensions. Wells Fargo was ordered to remediate harmed consumers and undertake certain activities related to its risk management and compliance management. The Bureau assessed a \$1 billion penalty against the bank and credited the \$500 million penalty collected by the OCC toward the satisfaction of its fine.	Consumer Financial Protection Bureau
Wells Fargo Advisors, LLC	11/13/2017	\$ 3,500,000.00	Wells Fargo Advisors failed to file or timely file at least 50 SARs, a majority of which related to continuing suspicious activity occurring in accounts held at Wells Fargo Advisors' U.S. branch offices that focused on international customers. By failing to file or timely file SARs as required, Wells Fargo Advisors willfully violated Section 17(a) of the Exchange Act and Rule 17a-8 thereunder.	Securities and Exchange Commission

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Wells Fargo	7/21/2017	\$ 577,500.00	The U.S. Department of Labor ordered Wells Fargo to reinstate and pay \$577,500 in back wages, damages and other fees to a former branch manager in Pomona who was terminated after she reported conduct by at least three private bankers working under her that she reasonably believed to be bank, wire and mail fraud.	Occupational Safety & Health Administration
Wells Fargo Bank N.A	4/3/2017	\$ 5,400,000.00	The Occupational Safety and Health Administration ordered Wells Fargo Bank N.A. to compensate and immediately reinstate a former bank manager who lost his job after reporting suspected fraudulent behavior to superiors and a bank ethics hotline.	Occupational Safety & Health Administration
Wells Fargo Securities, LLC and Wells Fargo Prime Services, LLC	12/21/2016	\$ 4,000,000.00	The Financial Industry Regulatory Authority fined 12 firms for significant deficiencies relating to the preservation of broker-dealer and customer records in a format that prevents alteration.	Financial Industry Regulatory Authority
Wells Fargo Advisors, LLC, Wells Fargo Advisors Financial Network, LLC and	12/21/2016	\$ 1,500,000.00	The Financial Industry Regulatory Authority fined 12 firms for significant deficiencies relating to the preservation of broker-dealer and customer records in a format that prevents alteration.	Financial Industry Regulatory Authority
Wells Fargo Bank, National Association	9/29/2016	\$ 20,000,000.00	The Office of the Comptroller of the Currency assessed a \$20 million civil money penalty against Wells Fargo Bank, N.A., and ordered the bank to make restitution to servicemembers who were harmed by the bank's violations of the Servicemembers Civil Relief Act.	Office of the Comptroller of the Currency
Wells Fargo Bank, N.A.	9/27/2016	\$ 400,000.00	The U.S. Commodity Futures Trading Commission (CFTC) today filed and simultaneously settled charges against Wells Fargo Bank, N.A. for failing to comply with its obligations to submit accurate large trader reports for physical commodity swap positions, in violation of the Commodity Exchange Act (CEA) and CFTC Regulations.	Commodity Futures Trading Commission

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Wells Fargo Bank	9/8/2016	\$ 100,000,000.00	The Consumer Financial Protection Bureau fined Wells Fargo Bank, N.A. \$100 million for what the bureau said was the widespread illegal practice of secretly opening unauthorized deposit and credit card accounts. Spurred by sales targets and compensation incentives, employees boosted sales figures by covertly opening more than two million accounts and funding them by transferring funds from consumers' authorized accounts without their knowledge or consent, often racking up fees or other charges. Wells Fargo was ordered to pay full restitution to all victims and a \$100 million fine to the CFPB's Civil Penalty Fund.	Consumer Financial Protection Bureau
Wells Fargo Bank	9/8/2016	\$ 35,000,000.00	The Office of the Comptroller of the Currency assessed a \$35 million civil money penalty against Wells Fargo Bank, N.A., and ordered the bank to make restitution to customers who were harmed by the bank's unsafe or unsound sales practices, including the unauthorized opening of deposit or credit card accounts and the transfer of funds from authorized, existing accounts to unauthorized accounts.	Office of the Comptroller of the Currency
Wells Fargo	9/8/2016	\$ 50,000,000.00	Wells Fargo agreed to pay \$50 million in civil penalties in settlement of allegations it opened accounts without the customers' consent and without informing them, leading to unwanted fees and financial consequences. Federal agencies separately settled these allegations at the same time.	Los Angeles (CA) City Attorney
Wells Fargo Bank	8/22/2016	\$ 4,010,000.00	The Consumer Financial Protection Bureau took action against Wells Fargo Bank for illegal private student loan servicing practices that increased costs and unfairly penalized certain student loan borrowers. The Bureau identified breakdowns throughout Wells Fargo's servicing process, including failing to provide important payment information to consumers, charging consumers illegal fees, and failing to update inaccurate credit report information. The CFPB's order required Wells Fargo to improve its consumer billing and student loan payment processing practices. The company was also ordered to provide \$410,000 in relief to borrowers and pay a \$3.6 million civil penalty to the CFPB.	Consumer Financial Protection Bureau
Wells Fargo Bank, N.A.	5/25/2016	\$ 70,000,000.00	The Office of the Comptroller of the Currency terminated its mortgage servicing-related order against Wells Fargo Bank, N.A. and assessed a \$70 million civil money penalty against the bank for previous violations of the order.	Office of the Comptroller of the Currency

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Wells Fargo Bank, National Association	4/8/2016	\$ 1,200,000,000.00	The Department of Justice announced the settlement of civil mortgage fraud claims against Wells Fargo Bank, N.A. stemming from its participation in the Federal Housing Administration Direct Endorsement Lender Program. In the settlement, Wells Fargo agreed to pay \$1.2 billion and admitted, acknowledged and accepted responsibility for, among other things, certifying to the Department of Housing and Urban Development, during the period from May 2001 through December 2008, that certain residential home mortgage loans were eligible for FHA insurance when in fact they were not, resulting in the government having to pay FHA insurance claims when some of those loans defaulted.	Justice Department Civil Division
Wells Fargo Bank N.A.	11/5/2015	\$ 81,600,000.00	The Department of Justice's U.S. Trustee Program entered into a national settlement agreement with Wells Fargo Bank N.A. requiring it to pay \$81.6 million in remediation for its repeated failure to provide homeowners with legally required notices, thereby denying homeowners the opportunity to challenge the accuracy of mortgage payment increases.	Justice Department U.S. Trustee Program
Wells Fargo Advisors, LLC and Wells Fargo Advisors Financial Network, LLC	7/6/2015	\$ 15,000,000.00	The Financial Industry Regulatory Authority ordered Wells Fargo Advisors, LLC, Wells Fargo Advisors Financial Network, LLC, Raymond James & Associates, Inc., Raymond James Financial Services, Inc. and LPL Financial LLC to pay more than \$30 million in restitution, including interest, to affected customers for failing to waive mutual fund sales charges for certain charitable and retirement accounts. Wells Fargo, Raymond James and LPL were required to pay affected customers an estimated \$15 million, \$8.7 million and \$6.3 million, respectively.	Financial Industry Regulatory Authority
Wells Fargo Bank	2/5/2015	\$ 4,000,000.00	Wells Fargo Bank agreed to pay a \$2 million penalty and provide approximately \$2 million in direct consumer restitution for secured loans made through its Nowline Visa Platinum Credit Card product with an interest in the borrower's home – which is not permissible under New York law.	New York Department of Financial Services

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Wells Fargo	1/22/2015	\$ 34,800,000.00	The Consumer Financial Protection Bureau and the Maryland Attorney General took action against Wells Fargo and JPMorgan Chase for what was said to be an illegal marketing-services-kickback scheme they participated in with Genuine Title, a now-defunct title company. The proposed consent orders, filed in federal court, would require \$24 million in civil penalties from Wells Fargo, \$600,000 in civil penalties from JPMorgan Chase, and \$11.1 million in redress to consumers whose loans were involved in this scheme.	Consumer Financial Protection Bureau
Wells Fargo Bank	1/22/2015	\$ 13,800,000.00	Wells Fargo Bank and JPMorganChase resolved allegations that they illegally steered customers to a now-defunct Maryland-based title company in exchange for marketing services that increased their customer base.	Maryland Attorney General
Wells Fargo Advisors and Wells Fargo Advisors Financial Network	12/18/2014	\$ 1,500,000.00	The Financial Industry Regulatory Authority announced that it has ordered two St. Louis-based broker-dealers under common control, Wells Fargo Advisors and Wells Fargo Advisors Financial Network, to pay a joint fine of \$1.5 million for anti-money laundering (AML) failures.	Financial Industry Regulatory Authority
Wells Fargo Advisors LLC	9/22/2014	\$ 5,000,000.00	The Securities and Exchange Commission announced that Wells Fargo Advisors LLC settled allegations of failing to maintain adequate controls to prevent one of its employees from insider trading based on a customer's nonpublic information. The SEC also charged Wells Fargo for unreasonably delaying its production of documents during the SEC's investigation and providing an altered internal document related to a compliance review of the broker's trading.	Securities and Exchange Commission
Wells Fargo	12/30/2013	\$ 591,000,000.00	Fannie Mae reached a \$591 million agreement with Wells Fargo to resolve repurchase requests on certain loans originated prior to 2009.	Fannie Mae
Wells Fargo Bank, National Association	9/27/2013	\$ 869,000,000.00	Freddie Mac announced a settlement with Wells Fargo concerning representations and warranties on single-family loans sold to Freddie Mac.	Freddie Mac
Wells Fargo Bank, N.A.	6/27/2013	\$ 23,937.00	Wells Fargo Bank, N.A. ("Wells Fargo") has agreed to remit \$23,937 to settle potential civil liability for 804 apparent violations of the Foreign Narcotics Kingpin Sanctions Regulations. The Office of Foreign Assets Control has determined that Wells Fargo voluntarily self-disclosed the apparent violations, and that the apparent violations constituted a non-egregious case.	Office of Foreign Assets Control



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Wells Fargo Advisors, LLC	6/4/2013	\$ 3,250,000.00	The Financial Industry Regulatory Authority ordered Wells Fargo Advisors, LLC, as successor for Wells Fargo Investments, LLC, to pay a fine of \$1.25 million and to reimburse approximately \$2 million in losses to 239 customers connected to unsuitable sales of floating-rate bank loan funds.	Financial Industry Regulatory Authority
Wells Fargo	1/7/2013	\$ 1,991,141,181.00	Ten mortgage servicing companies subject to enforcement actions for deficient practices in mortgage loan servicing and foreclosure processing reached an agreement in principle with the Office of the Comptroller of the Currency and the Federal Reserve Board to pay more than \$8.5 billion in cash payments and other assistance to help borrowers.	Office of the Comptroller of the Currency
Wells Fargo Bank	7/12/2012	\$ 234,300,000.00	The Department of Justice announced a settlement with Wells Fargo Bank resolving allegations that it engaged in a pattern or practice of discrimination against qualified African-American and Hispanic borrowers in its mortgage lending from 2004 through 2009.	Justice Department Civil Rights Division
Wells Fargo & Company	2/9/2012	\$ 5,342,200,000.00	The federal government and 49 state attorneys general reached a \$25 billion agreement with the nation's five largest mortgage servicers to address mortgage loan servicing and foreclosure abuses. The penalty figure is the total of the amounts specified in the the individual company's consent judgment for direct payments and homeowner relief.	Justice Department multiagency referral
Wells Fargo & Company	2/9/2012	\$ 87,000,000.00	The Federal Reserve Board released orders related to the previously announced monetary sanctions against five banking organizations for unsafe and unsound processes and practices in residential mortgage loan servicing and processing.	Federal Reserve
<b>Total</b>		<b>\$ 21,647,365,118.00</b>		